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Gentlemen and Ladies:

Although I have previously commented on the NAIS in general citing my support of the concept to aid in 48 hour traceback for animal disease surveillance, I also wanted to respond to the specific questions posed by USDA on the program implementation and to APHIS on the database ownership and management. My comments to the specific questions (which I have paraphrased) are as follows:

1. The draft program calls for MANDATORY animal ID by January 2009, is a mandatory program necessary to support the proposed program?

I feel it is an ambitious schedule but doable but only if it is mandatory. We all must report for this system to be effective and meaningful. Currently there are too many conflicting interpretations and several turf wars. USDA/APHIS should be the main principals in charge of overseeing and implementing the program and keeping it on track using federal authority. If we are not committed mentally or fiscally to this program then it should be scrapped or the program timeline greatly expanded, as we don't need this to be a fiasco.

2. At what point should compliance with the law be established if animals have to be ID'ed before movement or commingling (e.g. livestock shows, auction barns) and who should be responsible?

Compliance should be when the animals have left the premise to be sold or commingled and the seller should be responsible. If the animals are for sale or exhibition, they must be identified before being unloaded and that responsibility should lie with the management of the facility (unless it is a tagging station and the animals are there to be identified).

3. Are tagging sites (e.g. markets or other locations) a viable option for those who do not have the facilities to tag their own cattle ?

Absolutely! Many folks in the various livestock businesses may be in them for exhibition or lifestyle and they need assistance. In the beef cattle industry, older ranchers and smaller ranchers may not have the facilities or labor and a tagging station could provide these.

4. How should tagging and movement be reported and who should be responsible to do this in an efficient manner?

The owner or seller should be responsible for reporting within 24 hours to the state animal health agency by phone, fax, or electronically (email, etc).

5. Animals are supposed to be tagged prior to entering commerce or being commingle, should a minimum age (e.g. BSE free export market requires a birth date or month for age, USDA uses the 30 month tooth rule) requirement also be considered ?

I would agree that a minimum age requirement would be beneficial for the relatively small (percentage-wise) but valuable export market to alleviate fears concerning BSE infectiveness. If it were to be included, it needs to be done in conjunction with the launch of the NAIS, not included at some later date.

6. Are the timelines in the draft plan realistic?

They are only if we all pull together. If we drag our feet and worry about turf wars and waste time over minor issues then we will fall far behind.

7. Should the requirements for all species be implemented at the same time or should some flexibility be allowed?

Personally I would like to see us all in this together. Realistically, some species are a bit farther ahead of beef and some quite a bit behind and possibly some shouldn't be worried about. Let's get the food animals done first, perhaps beef and dairy cattle at the onset and then swine, sheep and goats later simply because of tonnage. The poultry industry can speak for themselves.

8. What are the best ways to submit information to the database?

A paper trail (paper or electronic) is best I would think. Since time is of the essence in reporting movements, faxes and email or some form of electronic reporting (like this docket system) needs to be required. A phone call would be sufficient if followed by a paper trail.

9. What specific information should be protected from disclosure?

I would like to see ALL of the information protected from disclosure except to animal health authorities and NEVER to the general public or allied animal industry. Granted the federal government already knows much about livestock producers if they participate in federally funded programs or file a Schedule F, but I don't want outside private sources to have access to ANY of the data I provide or report.

10. How can the burden of keeping records be reduced (e.g. should both the buyer and seller report the sale of animals)?

Initially I think both the buyer and seller should report movement (or sightings) but later the buyer probably should have the burden of responsibility since they alone will know where the animals will finally wind up. This is just going to take some time and a lot of paperwork to get it done right.

As regards APHIS requesting comments on utility of a privately held database (instead of the government), I will respond in the following:

1. How should the private database be funded?

I disagree that there should be a private database. I think the federal government; USDA/APHIS and the respective state health agencies should maintain any database. I don't trust the private industry to not mine the database for saleable information at some point in time.

2. Should there be only one or multiple databases?

No. There should be only one governmental database with a backup system unless the activity requires speciation.

3. Should there be both a private and a government system so producers could have a choice?

I prefer the government, USDA/APHIS and the respective state agencies to be the repository. If there are two types of systems then that will lead to confusion and data loss.

4. Should a privately managed system include all species?

A system managed by the government could handle all species. It would be more efficient.

5. Would either system work well at the state level?

Again, I am opposed to a private system AT ANY LEVEL.

I want to thank you for the opportunity to respond to your questions. We are a small operator, running a few cows, some stockers and an artificial insemination company here in South Texas but it is important all of us be heard as only we can tell you how this program will affect us and how we think it should be handled. I have no ties to any state or national cattlemen's organization and often find myself at odds with their stated goals.

Sincerely,

Joe C. Paschal